

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

IN RE: BARD IVC FILTERS
PRODUCTS LIABILITY LITIGATION

No. 2:15-MD-02641-DGC

This Document Relates to All Actions

JOINDER OF FERRER, POIROT & WANSBROUGH
IN THE RESPONSE OF FREESE & GOSS AND MATTHEWS & ASSOCIATES
IN OPPOSITION TO PLAINTIFFS' MOTION SEEKING
ESTABLISHMENT OF COMMON BENEFIT FEE AND EXPENSE
ACCOUNTS PURSUANT TO CASE MANAGEMENT ORDER NO. 6 AND
MODIFICATION OF CASE MANAGEMENT ORDER NO. 6.

FERRER, POIROT & WANSBROUGH, for itself and as the legal representative for plaintiffs with claims filed in the Bard IVC Filter MDL, hereby joins in the arguments and authorities stated, and relief requested, in the "Response in Opposition to Plaintiffs' Motion Seeking Establishment of Common Benefit Fee and Expense Accounts Pursuant to Case Management Order No. 6 and Modification of Case Management Order No. 6," filed by Freese & Goss and Matthews & Associates, same of which is adopted by reference and incorporated herein, the same as if fully set forth.

Dated: April 26, 2018.

Respectfully Submitted,

FERRER, POIROT, & WANSBROUGH

By: /s/John T. Kirtley, III

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CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of April, 2019, a copy of the foregoing pleading was filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access this filing through the Court's system and notice of this filing will be sent to these parties by operation of the Court's electronic filing system.

/s/John T. Kirtley, III
John T. Kirtley, III